



NTT America, Inc.  
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**Via CPNI Web Portal**

February 23, 2015

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

Received & inspected

FEB 25 2015

FCC Mail Room

Re: EB Docket No. 06-36


Dear Ms. Dortch:

Enclosed, please find the 2014 Customer Proprietary Network Information Certificate ("CPNI") which NTT America, Inc., pursuant to 47 C.F.R. §64.2009(e), hereby submits.

If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully Submitted,

NTT America, Inc.

By:   
Alex Morel

No. of Copies rec'd \_\_\_\_\_  
List ABCDE

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2014

Date filed: February 23, 2015

Name of company(s) covered by this certification: NTT America, Inc.

Form 499 Filer ID: 817390

Name of signatory: Ryan Colgan

Title of signatory: Vice President and Deputy General Counsel

I, Ryan Colgan, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed 

## **NTT America, Inc.**

### **Statement on CPNI Compliance**

1. NTT America, Inc. ("NTTA") has established operating procedures to comply with Section 222 of the Act, 47 C.F.R. § 222, and the Commission's rules implementing Section 222, 47 C.F.R. § 64.2001 *et seq.* governing the use, disclosure and access to customer proprietary network information ("CPNI"). In this statement, NTTA explains how its operating procedures ensure that it is in compliance with these rules.
2. NTTA predominately provides high capacity data services to business customers. NTTA uses CPNI for purposes of providing and rendering services to its customers (e.g., billing and collection), but it does not use CPNI for marketing purposes. NTTA has established a supervisory review process for all sales campaigns, and NTTA maintains a record of its sales campaigns for a one year period.
3. Nor does NTTA disclose CPNI to third parties, except as may be necessary to render and bill for services.
4. NTTA trains personnel regarding when they are and are not authorized to use CPNI. NTTA has an express disciplinary process in place for violations of its policies.
5. NTTA has implemented reasonable measures to protect the security of customer information, including CPNI.
6. NTTA tracks customer complaints regarding the use of CPNI. NTTA also has instituted measures to discover and protect against unauthorized attempts to access CPNI (i.e., pretexting).
7. NTTA tracks breaches of CPNI and will notify the United States Secret Service, the Federal Bureau of Investigation, and its customer (if permitted) upon reasonable discovery of a breach of CPNI. NTTA will maintain a record of such information for a two-year period.
8. NTTA will submit an annual CPNI certification to the FCC from an officer with personal knowledge of the policies and procedures that it has established to safeguard CPNI.